

In The Matter Of:
Valencia Colon v.
Richard Roundtree et al

Alzater Johnson
February 4, 2022

Kellie K. Rodman, LLC
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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF GEORGIA
3 AUGUSTA DIVISION

4 Valencia Colon,)
5 Plaintiff,)
6 v.) Civil Action File No.
7) 1:21-cv-00149-JRH-BKE
8 Richard Roundtree, et al.,)
9 Defendants.)

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12 The videotaped videoconference deposition of
13 ALZATER JOHNSON, taken for purposes of discovery,
14 cross-examination, and all other purposes allowed
15 under the Civil Practice Act of Georgia; all
16 formalities waived; the reading and signing of the
17 deposition waived; before Jennifer A. Gerber, CCR
18 6241-2465-4151-2704, Certified Court Reporter, in
19 and for the State of Georgia; commencing at
20 11:25 a.m., February 4th, 2022, Augusta, Georgia.

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17 ALSO IN ATTENDANCE:
18 ERIC GEORGE, VIDEOGRAPHER
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1 I N D E X
2
3 CROSS-EXAMINATION BY MR. CAUTHORN Page 5
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6
7 E X H I B I T S
8
9 EXHIBIT DESCRIPTION PAGE MARKED/
10 NUMBER IDENTIFIED
11 (No Exhibits were marked or presented for identification.)
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20 T R A N S C R I P T L E G E N D
21 . . . (ellipses) Halting speech or an unfinished sentence
22 in dialogue or an omission when reading
23 -- (dashes) written material
24 (ph) Break in speech continuity
25 (sic) Spelled phonetically
In its original form

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1 P R O C E E D I N G S
2 11:25 a.m.
3 (Whereupon, the court reporter complied with the
4 requirements of O.C.G.A. 9-11-28(c).)
5 THE VIDEOGRAPHER: All right. This is the deposition
6 of Alzater Johnson in the matter of Colon versus
7 Roundtree. Today's date is February 4th, 2022. The
8 time is 11:25. We are on the record.
9 THE COURT REPORTER: Okay. And, again, today's date
10 is February 4th, 2022 and the time is 11:25 a.m. This is
11 the case of Colon versus Roundtree. At this time, can
12 everyone please state their name and who they represent?
13 MR. CAUTHORN: My name is Wick Cauthorn. I represent
14 the Plaintiff.
15 MS. HAYNES: Tameka Haynes for the Defendants, and
16 Randolph Frails as well. Ms. Johnson, state your name.
17 THE WITNESS: Alzater Johnson.
18 THE COURT REPORTER: And who are you representing
19 today?
20 MS. HAYNES: You work for the --
21 THE WITNESS: I work for Augusta Parks and Rec --
22 THE COURT REPORTER: Thank --
23 THE WITNESS: -- Department.
24 THE COURT REPORTER: Thank you. My name is Jennifer
25 Gerber. I am the court reporter. We are all appearing

<p style="text-align: right;">Page 5</p> <p>1 via Zoom today. Do all parties agree to have the witness 2 sworn remotely? 3 MR. CAUTHORN: Yes. 4 MS. HAYNES: Yes. 5 THE WITNESS: Yes. 6 THE COURT REPORTER: Thank you. 7 (Whereupon, the witness was sworn remotely by the court 8 reporter per agreement of counsel.) 9 Whereupon, 10 ALZATER JOHNSON 11 Was called as a witness herein and, having been first duly 12 sworn, was deposed and testified as follows: 13 CROSS-EXAMINATION 14 BY MR. CAUTHORN: 15 Q Ms. Johnson, my name is Wick Cauthorn. I represent 16 Valencia Colon in this case. And we are taking this deposition 17 based on communications that I've had with defense counsel who 18 represent Augusta and the sheriff's department and all the 19 defendants in this case. And my understanding, based on the 20 communications with defense counsel, is that you are here to 21 testify as a -- as a representative of Augusta-Richmond County 22 with regard to policies and events at Julian Smith Casino; is 23 that correct? 24 A Correct. 25 Q That's your understanding?</p>	<p style="text-align: right;">Page 7</p> <p>1 Olmstead Park. That's all in one vicinity. 2 Q Okay. And the Julian Smith Casino, is that a -- is 3 that a building that is located at the park? 4 A That's a building that's located at the park. 5 Q Okay. How long have you been the superintendent at 6 Julian Smith Casino? 7 A Roughly 15 years. 8 Q Okay. And were you the superintendent on June 14th 9 of 2019? 10 A Yes, I was. 11 Q Okay. Are you familiar with an organization called 12 25 Gents? 13 A Yes, I am. 14 Q Okay. What is 25 Gents? 15 A It's a group of men that do work for the community. 16 Q It's a service organization? 17 A More or less. I mean, they do things for the 18 community, yes. 19 Q And I'm not gonna ask you to tell me everything they 20 do for the community, but can you just give me a for instance 21 or an example of things they do for the community? 22 A Well, as far as I know, I've just heard them say 23 that, you know, they help youth, with community projects, and 24 help children and adults as well. But wherever they see a 25 need, they help with it.</p>
<p style="text-align: right;">Page 6</p> <p>1 A Yes. 2 Q Okay, good. I just wanna make sure. And -- and you 3 understand that you're not a party to this case, and you're not 4 a defendant. You're just here because Augusta can only talk 5 through people. It can't talk through -- by itself. And so 6 you've been designated as -- as one of those people who can 7 talk. Do you understand that? 8 A I understand. 9 Q Okay, good, good. What is your -- can you say and 10 spell your full name for the court reporter? 11 A It's Alzater, A-L-Z-A-T-E-R, Johnson, J-O-H-N-S-O-N. 12 Q Okay. Do you have a middle name? 13 A No. 14 Q Okay. And what is your occupation, Ms. Johnson? 15 A For the Richmond County Parks and Recreation -- we're 16 called superintendents. 17 Q Okay. What does -- what does being a superintendent 18 entail? 19 A The superintendent entails working for the facility, 20 working for different events that happens at the facility, and 21 just taking care of the premises in general. 22 Q And is there a specific facility where you're 23 assigned? 24 A I am. I'm assigned to the Julian Smith Casino and 25 also the Julian Smith Casino Barbeque Pit as well as the Lake</p>	<p style="text-align: right;">Page 8</p> <p>1 Q Gotcha, okay. Do you -- do you have a personal 2 relationship with any members of the -- of the 25 Gents? 3 A In some ways I do because I've been working with them 4 for so long, you know, when they come up and have their events. 5 So I guess you would say that would be kind of like a personal 6 relationship because of the fact that I've been working with 7 them for a long time. So I know they're a great group of guys. 8 I know -- you know, I help them with their set ups and things 9 like that, uh-huh (affirmative). 10 Q So -- so you -- you -- you -- you would describe it 11 as a personal relationship, but -- but your relationship does 12 only arise out of your job -- 13 A Uh-huh (affirmative). 14 Q -- as a superintendent? 15 A Yeah, I only know them through the working. Now -- 16 Q That's what -- 17 A -- a couple -- a couple of them I know outside of the 18 work, but for the most part, I know most of them just through 19 working with them at their events. 20 Q Okay. Who do know outside of work? 21 A I know Mr. Jones -- Mr. Claude Jones. 22 Q I -- I didn't catch his first name. 23 A Claude -- Mr. Claude Jones. 24 Q How do you know Mr. Jones? 25 A We used to live in the same neighborhood years ago.</p>

<p style="text-align: right;">Page 9</p> <p>1 About 30, 40 years ago we stayed in the same neighborhood.</p> <p>2 Q Gotcha. Anyone else besides Mr. Jones?</p> <p>3 A Mr. Washington. I don't remember his first name, but</p> <p>4 Mr. Washington.</p> <p>5 Q Is it Willie?</p> <p>6 A Willie Washington.</p> <p>7 Q Is that right? Just a second, I'm -- because I'm</p> <p>8 trying to clarify.</p> <p>9 A Uh-huh (affirmative).</p> <p>10 Q Willie Washington, is that -- is that -- is that --</p> <p>11 A Willie Washington, uh-huh (affirmative).</p> <p>12 Q Okay. How do you know Mr. Washington?</p> <p>13 A That's through church, basically, because we used to</p> <p>14 fellowship at each other's church.</p> <p>15 Q All right. What churches are those? What's your</p> <p>16 church and what's his church?</p> <p>17 A My church is Good Hope Missionary Baptist Church and</p> <p>18 at the time -- we were very young -- I think Mr. Washington was</p> <p>19 attending Moses Baptist Church.</p> <p>20 Q Okay.</p> <p>21 A Now, I don't know if that's where he's still going,</p> <p>22 you know.</p> <p>23 Q And when you say you used to fellowship, that means</p> <p>24 that y'all's churches used to have a -- have a -- have a</p> <p>25 relationship and an over -- and an overlap?</p>	<p style="text-align: right;">Page 11</p> <p>1 around --</p> <p>2 A Occasions, uh-huh (affirmative). On occasions, yeah.</p> <p>3 Q What -- what are your responsibilities as a</p> <p>4 superintendent at Julian Smith Casino?</p> <p>5 A On a daily basis or when we have an event, which one?</p> <p>6 Q Well, let's start on a daily basis, and then we'll</p> <p>7 talk about --</p> <p>8 A On a daily -- on a daily basis, okay, I work with the</p> <p>9 community service people. People that's doing probationary</p> <p>10 stuff with DUIs and, you know, the judge sentences them 40</p> <p>11 hours and they'll come there. That's one of the places that</p> <p>12 they can come and do that. So I work with them on a daily</p> <p>13 basis.</p> <p>14 And we have to take care of the premises, which includes</p> <p>15 that entire park that I'm speaking of. Showing the building to</p> <p>16 someone that may wanna rent the facility. We have to do that.</p> <p>17 Calling various clients that have already booked the facility</p> <p>18 to find out just what their needs might be on the day that they</p> <p>19 need to come in, that's daily.</p> <p>20 Q Okay. And what types of needs do you handle for --</p> <p>21 for -- and when you say clients, I'm guessing you mean people</p> <p>22 who have rented the event --</p> <p>23 A The -- yeah, I have to find out how many tables and</p> <p>24 chairs you might need for your set up, what time you need to</p> <p>25 get in, do you have a caterer, will they be using the kitchen</p>
<p style="text-align: right;">Page 10</p> <p>1 A Yes, yes.</p> <p>2 Q Besides Mr. Jones and Mr. Washington, is there anyone</p> <p>3 else that's --</p> <p>4 A I can't think of anyone right now that I have a</p> <p>5 personal relationship with other than outside of just their</p> <p>6 functions.</p> <p>7 Q Okay. And I'm -- and it sounds like these are old</p> <p>8 relationships in the -- from -- from the community, and that --</p> <p>9 do you have any ongoing active friendship with Mr. Jones other</p> <p>10 than as an acquaintance in the community and a former neighbor?</p> <p>11 A No.</p> <p>12 Q Okay.</p> <p>13 A I don't.</p> <p>14 Q And the same question with Mr. Washington.</p> <p>15 A When was working I did, now, because he used to work</p> <p>16 for International Paper, and I used to work at the credit</p> <p>17 union. And he was a member of that credit union.</p> <p>18 Q And -- and Mr. Jones or Mr. Washington?</p> <p>19 A Mr. Jones.</p> <p>20 Q Okay, understood, understood. But you -- I -- I</p> <p>21 guess what I'm getting at, though, is y'all do not see each</p> <p>22 other on any kind of regular basis or get together?</p> <p>23 A No, no, uh-uh (negative).</p> <p>24 Q You're -- you're friendly the way someone is with</p> <p>25 a -- with a neighbor or someone that you see every now and then</p>	<p style="text-align: right;">Page 12</p> <p>1 as far as cooking, will they be using the upstairs as far as</p> <p>2 changing clothes. Anything that has to do with that building</p> <p>3 we have to find out prior to you coming in.</p> <p>4 Q Okay. And then you make arrangements to help</p> <p>5 facilitate their event?</p> <p>6 A Uh-huh (affirmative).</p> <p>7 Q Okay. Who puts out the tables and -- and chairs and</p> <p>8 opens up the kitchen and unlocks doors and all that kind of</p> <p>9 stuff?</p> <p>10 A That's -- the attendant opens up the building because</p> <p>11 there's an alarm. So the superintendent has to be on duty at</p> <p>12 all times. As far as putting out the tables and chairs, that's</p> <p>13 up to the individual people for their set ups. Yeah, they do</p> <p>14 that.</p> <p>15 Q Okay. Do y'all provide the tables and chairs, or do</p> <p>16 they have to --</p> <p>17 A We provide the tables and chairs.</p> <p>18 Q Okay. What all do y'all provide that's like tables</p> <p>19 and chairs? I mean, do -- do y'all -- would y'all provide, for</p> <p>20 instance, pots and pans in the kitchen if the kitchen was used?</p> <p>21 A No, we do not provide pots and pans. The only thing</p> <p>22 we provide would be the stove, refrigerator, and ice machine.</p> <p>23 Q Okay, okay. Now, tell me what you do as a</p> <p>24 superintendent at an event?</p> <p>25 A Make sure that whoever has rented the facility is</p>

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1 comfortable with the building. And that means making sure that
2 they're satisfied with the cleanliness of the building and how
3 things are set up as far as our set up is concerned. What they
4 set up, that's their thing.
5 And, of course, they have to follow rules and regulations
6 on how they set it up, but -- you know, not to block exit doors
7 and things like that. So you make sure of that and then you
8 just sort of walk around and make sure that everybody's
9 comfortable, that there's no spills on the floor, nobody's
10 acting crazy -- I call it -- and that kind of stuff.
11 Q All right. And when -- when the event is going on,
12 where are you and -- and --
13 A I'm all over the place. I'm -- I'm just all over the
14 place. I'm in no one particular place. I don't put myself in
15 a position to be sitting in their party. We don't do that.
16 But I just kind of pop up periodically to look around and make
17 sure that everything is going well. And, you know, checking
18 the bathrooms and making sure that everything is in there, that
19 they're still clean, they've got plenty of toilet paper, and
20 that kind of stuff, yeah.
21 Q Okay. Do you -- do you do any walk-throughs or any
22 kind of observations of the parking lot or anything like that?
23 A I do not do parking lot.
24 Q Okay.
25 A No. I walk through inside the building.

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1 Q Okay, okay. Do you do -- coordinate with the -- with
2 the sheriff's deputies that provide security?
3 A Sometimes I do. Yeah, sometimes I do.
4 Q When -- what -- what do you do with the -- what --
5 what is your interaction with the sheriff's deputies when you
6 do have an interaction?
7 A I need to make sure that they're there on time.
8 Because people are paying them, so I have to make sure that
9 they're there on time.
10 Q Okay. And are you told who the sheriff's deputy is
11 gonna be ahead of time, or do you find out the day of the
12 event?
13 A Do I do what, now?
14 Q Do you find out who the sheriff's deputy is gonna be
15 ahead of time, or do you find out the day of the event?
16 A No, I find out ahead of time.
17 Q All right. Who tells you who the sheriff's deputy is
18 gonna be?
19 A Normally, the person that I work with or my
20 supervisor tells me. Because they call and get the deputies,
21 so they let me know who's coming so I know who to expect.
22 Q Who's your supervisor?
23 A Chrislynn Kuhlke.
24 Q Okay.
25 A And then my coworker, Darrell Mayle.

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1 Q Okay, all right. Oh, do you have a -- do you have a
2 county email or a city email?
3 A I do not.
4 Q You do not, okay. What is your work schedule?
5 What's your typical week?
6 A My typical week is Monday through Friday from 8:30 to
7 2:30, Fridays from 8:30 to 1:30.
8 Q Okay.
9 A I only do 29 hours --
10 Q If the -- sorry, go ahead.
11 A I only do 29 hours a week.
12 Q All right. And do you -- what happens when you have
13 to work at an event -- and work as superintendent at an event?
14 How do you accommodate that in your time?
15 A That's just -- that's extra. So that's separate
16 because they have to pay us individually for that.
17 Q I see.
18 A So if we have -- yeah, if I have something, say this
19 afternoon at 5:00, then I would just be at work at 5:00 for
20 that particular guest that's gonna use the building.
21 Q Okay. And my understanding is that the guests also
22 pay the -- the sheriff's deputies?
23 A Right, and the firemen, uh-huh (affirmative).
24 Q Okay. Do they pay by check or by cash?
25 A It depends. Some pay by check, but for the most

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1 part, cash.
2 Q All right. How much is the charge for you -- how --
3 how much do you get paid for working at an event?
4 A Superintendents are paid \$20 an hour, minimum four
5 hours.
6 Q Okay, all right. Do you know how much the deputies
7 are paid for security?
8 A Deputies are paid \$30 an hour, firemen are paid \$30
9 an hour, holidays 35.
10 Q What's a holiday? Do you mean a specific holiday, or
11 is there --
12 A Yeah, like the Fourth of July, Christmas day,
13 whatever, yeah, that's 35.
14 Q Okay. Do you get a holiday bonus if you have to
15 work?
16 A No, I do not.
17 Q Okay.
18 A It'd be nice --
19 Q That doesn't seem fair to me. Do you -- are you
20 required to work every event at Julian Smith, or -- or do
21 you -- or can you choose to not work an event and ask --
22 A I can choose not to work an event.
23 Q Okay. Did you work the event on June 14th, 2019,
24 the 25 Gents event?
25 A I did.

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1 Q Okay. And do you recall what -- about what time that
2 event started?

3 A Normally, it's around 6:00 or 6:30. I'm not gonna
4 say for sure it happened, that was two years ago, almost three
5 now, so. Normally, it's around 6:00 or 6:30 when the Gents
6 come in -- and we refer to them as the Gents because they're
7 dressed like gents -- so they normally come in around 6:00 or
8 6:30 because they wanna make sure that everything's set up and
9 stuff like that. So I -- I meet them there because they can't
10 get in the building without me.

11 Q Okay. And how late does the party go?

12 A The party goes until 12:00, but normally they start
13 leaving prior to that because everything shuts down. I'd say
14 around 11:30 -- the drinking and that kind of thing shuts down
15 at 11:30. The DJ set shuts down at 11:45. So when you tell
16 people they can't drink anymore, they normally pack up and
17 start leaving.

18 Q Gotcha, okay.

19 A Yeah.

20 Q And when you say -- who's -- who's -- who's providing
21 the alcohol at the Gents event?

22 A Well, this particular event, it's what they call a
23 BYOB. They buy their own -- they bring their own.

24 Q The guests bring their own alcohol?

25 A Uh-huh (affirmative).

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1 Q Okay, okay. When guests bring their own alcohol,
2 where do they put their -- their -- their coolers and -- and
3 things like that?

4 A We -- okay, most of the time they don't bring
5 coolers --

6 Q Uh-huh (affirmative).

7 A -- because we don't really allow coolers on our
8 floor. That's one reason why I'll be there walking around. We
9 have an old wooden floor --

10 Q You don't want --

11 A -- so they don't -- they don't bring coolers. They
12 now have the nice little bags that they zip up that they put
13 alcohol in, yeah.

14 Q Okay, okay. The people -- I mean, the -- you mean
15 like a soft -- a soft type of a bag that holds -- that holds --

16 A Yeah, stuff like that. Yeah, uh-huh (affirmative).

17 Q But y'all don't -- y'all don't want anybody bringing
18 a hard cooler and putting it on that floor?

19 A No, no, not on the floor.

20 Q Okay, all right. Do people -- if someone has a hard
21 cooler, do they leave it in their car and then come and go back
22 and forth to their car to get their --

23 A No, they don't. They'll -- just kind of like two or
24 three people in the car and they'll just take it out and then
25 bring it in and such. You know, they just forgot what they

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1 were doing, they say, so. But they still know they can't put
2 coolers on my floor.

3 Q I -- I understand. I just -- I just -- I've been to
4 several of these parties where you just have a -- maybe
5 something -- something in the trunk of your car and you just
6 keep going back and forth.

7 A Yeah.

8 Q Okay.

9 A No, we don't, you know, have that back-and-forth,
10 uh-uh (negative).

11 Q Okay, okay. On June 14th, 2019 at the 25 Gents
12 function -- at the Gents function, how many -- about how many
13 guests were there?

14 A That, again, I'm not so sure of right now, but it
15 would have had to have been under 200.

16 Q Okay. And why do you say --

17 A Normally -- well, under 200. Because we only have
18 one policeman when you have 200 or less guests, so it would
19 have had to have been under 200. It could have been 180, 185,
20 190, but not over 200.

21 Q Okay.

22 A Yeah.

23 Q And the -- the -- other than the -- other than the
24 sheriff's deputy who was providing security, was there anybody
25 else there? Was there anybody from the fire department there?

Page 20

1 A Yeah, a fireman -- one fireman.

2 Q Do you know the name of the person who was there?

3 A I don't remember who the fireman was at the time.

4 Q What does the fireman do when they're there? What --
5 what do the firemen do as -- as --

6 A Well, when the firemen come in we do what we call a
7 walk-through. He -- you know, he and I walked through the
8 building. Because he has to make sure that all the exit doors
9 are open, the -- there's no cords running across the floors,
10 nothing hazardous that could happen pertaining to a fire and
11 people getting in and out. Basically, they check the DJs,
12 really, you know, for the speakers and cords and that kind of
13 thing. So that's what they do. They check the ovens and then
14 we have -- and stuff in the building, they check that. So they
15 just make sure that everything is open so if people need to get
16 in and out, they can.

17 Q Okay. And --

18 A And they also check capacity as well. They check
19 that too.

20 Q What is the capacity of the casino?

21 A If you wanna all sit down and have dinner, we can do
22 600. But if you wanna have a party and you wanna dance, we do
23 350 because you're setting up tables and chairs -- and so we do
24 350 for that. And with Covid going on, we're doing less than
25 that because of, you know, the virus.

<p style="text-align: right;">Page 21</p> <p>1 Q Okay. Who was your contact with the 25 Gents on the</p> <p>2 day of June 14th, 2019? Who was -- who was managing the party</p> <p>3 and -- and -- and planning the party?</p> <p>4 A That would be hard to say. The Gents work together.</p> <p>5 So my contact would have been either Mr. Jones or Mr. Robinson</p> <p>6 or Mr. Willie.</p> <p>7 Q Okay.</p> <p>8 A But they all work together. They all come in and</p> <p>9 work together.</p> <p>10 Q Who's Mr. Robinson?</p> <p>11 A He's one of the presidents. I don't know if he's</p> <p>12 past or present. I don't know how -- how -- who's -- who now,</p> <p>13 you know. But I know at one point he was one of the -- he was</p> <p>14 a president at one point.</p> <p>15 Q Okay. Do you know Charlie Walker?</p> <p>16 A Do I know him?</p> <p>17 Q Yes.</p> <p>18 A Not know him, no, uh-huh (negative).</p> <p>19 Q Okay. Do you know -- my understanding is that he was</p> <p>20 providing security at the event on June 14th of 2019; is that</p> <p>21 right?</p> <p>22 A Uh-huh (affirmative).</p> <p>23 Q Okay. Had you met him before that night?</p> <p>24 A Oh, yeah, yeah. I had met him before that, yeah.</p> <p>25 I've worked with him maybe two or three times. I don't know</p>	<p style="text-align: right;">Page 23</p> <p>1 and check. You know, I don't go check the cars and see what</p> <p>2 kind of cars they come in, yeah.</p> <p>3 Q You just confirm that they're there?</p> <p>4 A I confirm that they're there, uh-huh (affirmative).</p> <p>5 Q Okay. Did you happen to see him drive up?</p> <p>6 A No.</p> <p>7 Q Okay. Have you worked with him at an event since</p> <p>8 June 14th of 2019?</p> <p>9 A I don't believe so. I don't think so, yeah.</p> <p>10 Q Okay.</p> <p>11 A If I have, I just don't remember, you know, because</p> <p>12 that's in and out. We have a lot of events, but I don't</p> <p>13 believe so.</p> <p>14 Q Do you know if he's worked an event since June 14th</p> <p>15 of 2019?</p> <p>16 A I don't know.</p> <p>17 Q Okay. What are the responsibilities of the sheriff's</p> <p>18 deputy during an event?</p> <p>19 A To check and make sure that everything is in order --</p> <p>20 that people stay in order. And, basically, just the security.</p> <p>21 To make sure that everybody leaves when they're supposed to</p> <p>22 leave. And in this particular case, we didn't have an open</p> <p>23 bar. So they make sure at 11:30 when the DJ announces drinking</p> <p>24 has now stopped, they're kind of like walking around and make</p> <p>25 sure you're not drinking. You gotta pack it up, you know,</p>
<p style="text-align: right;">Page 22</p> <p>1 exactly how many. Not a lot, but I have worked with him in the</p> <p>2 past, yeah.</p> <p>3 Q Okay.</p> <p>4 A He's not there a lot, yeah.</p> <p>5 Q Okay. And -- and what types of interactions had you</p> <p>6 had with him outside of working with him?</p> <p>7 A That's it. That's all, yeah.</p> <p>8 Q Okay. So just -- just what you have -- just the</p> <p>9 times where he's worked security at an event where you were</p> <p>10 acting as superintendent?</p> <p>11 A Uh-huh (affirmative), right, right.</p> <p>12 Q Okay. Did -- do you know if he consumed any alcohol</p> <p>13 on June 14th of 2019?</p> <p>14 A I don't know if he did, but I've never seen him do</p> <p>15 that, you know. I mean, I'm not with him 24/7, but I've never</p> <p>16 seen any of our officers do that, uh-huh (negative) -- never,</p> <p>17 uh-huh (negative).</p> <p>18 Q Was he wearing a sheriff's uniform -- a deputy's</p> <p>19 uniform?</p> <p>20 A Oh, yeah. By all means, yeah.</p> <p>21 Q Was he in a -- in a Richmond County Sheriff's police</p> <p>22 car?</p> <p>23 A Now, that I don't know.</p> <p>24 Q Okay.</p> <p>25 A I -- I wouldn't know, because I don't go out the side</p>	<p style="text-align: right;">Page 24</p> <p>1 yeah.</p> <p>2 Q And do they -- do they walk around on the inside of</p> <p>3 the -- of the facility, or do they stay outside the facility?</p> <p>4 A No. They're inside and outside.</p> <p>5 Q Okay.</p> <p>6 A They're in and out, uh-huh (affirmative).</p> <p>7 Q Do you know on June 19th how much Mr. Walker was</p> <p>8 inside the event?</p> <p>9 A I do not. I don't know.</p> <p>10 Q Okay. Are they -- are they supposed to leave the</p> <p>11 event before it's over, or are they supposed to stay the</p> <p>12 whole -- until everybody else is gone?</p> <p>13 A They stay until everybody's gone.</p> <p>14 Q Okay. On June 14th, would that have been until</p> <p>15 midnight?</p> <p>16 A I don't know, see, because, like I said, at 11:30</p> <p>17 when we stopped the drinking, people start leaving. And I'm</p> <p>18 doing what I need to do, you know, at that time. So I'm not</p> <p>19 keeping up with what the fireman and the policeman is doing</p> <p>20 because I'm doing what I need to do. So I couldn't pinpoint</p> <p>21 that.</p> <p>22 Q Okay. I -- I just mean as -- as the person who's</p> <p>23 kind of running point guard, are they supposed to be there</p> <p>24 until the -- until -- until everybody's gone?</p> <p>25 A Supposed to, yeah.</p>

<p style="text-align: right;">Page 25</p> <p>1 Q Okay.</p> <p>2 A Supposed to be there, yeah.</p> <p>3 Q Okay. And that's because the people hosting the</p> <p>4 party are paying them to be there?</p> <p>5 A That's very true. But, for instance, if you had a</p> <p>6 party and you turned your party out at 11:00, that doesn't mean</p> <p>7 that the officer and the fireman has to stay there until 12:00.</p> <p>8 If everybody's out of the building and gone and the grounds are</p> <p>9 secured, the officer can leave.</p> <p>10 Q Oh, I understand that. I understand that.</p> <p>11 A Okay, all right.</p> <p>12 Q On June 14th at the -- at the 25 Gents event, who</p> <p>13 was the last person to leave?</p> <p>14 A Who? That would have been me.</p> <p>15 Q Really?</p> <p>16 A That would have been me and one of the -- and one or</p> <p>17 two of the Gents because they stay until everybody's gone off</p> <p>18 the premises and all that kind of stuff. And then the other</p> <p>19 person that was working with me, we would have been the last</p> <p>20 ones to leave.</p> <p>21 Q Okay.</p> <p>22 A Because we --</p> <p>23 Q Was that Gerald Smith?</p> <p>24 A That's Gerald Smith, yeah.</p> <p>25 Q All right. When you left, was Charlie Walker still</p>	<p style="text-align: right;">Page 27</p> <p>1 right? And -- and -- and I --</p> <p>2 A -- just not the case, so. It just depends on the</p> <p>3 people and the people that's paying and what they're doing.</p> <p>4 Sometimes the people are still at -- you know, gathering up</p> <p>5 their decorations, wedding stuff, and all that kind of stuff.</p> <p>6 And so the -- and once you've got all the guests out except for</p> <p>7 me, whoever's working with me -- one or two other people --</p> <p>8 they don't -- really don't have to stay, yeah.</p> <p>9 Q I understand. Once -- once the -- once the party's</p> <p>10 over and it's just the -- and it's just the winding down of the</p> <p>11 hosts, they might leave?</p> <p>12 A Uh-huh (affirmative).</p> <p>13 Q Okay. On -- on June 14th, when you were locking</p> <p>14 the door and leaving, do you know if the -- if the fireman was</p> <p>15 still there?</p> <p>16 A I doubt it. I'm just saying that I doubt it because</p> <p>17 normally, you know, it's -- it's just us -- it's just me and</p> <p>18 the Gents. The Gents always stay -- two or three of them -- to</p> <p>19 make sure everything's in order for them, as far as the</p> <p>20 building is concerned. They wanna make sure nothing is torn up</p> <p>21 and nothing is broken and that. They'll stay, you know, but</p> <p>22 other than that, no, nobody else has to stay.</p> <p>23 Q They wanna make sure they get their deposit back?</p> <p>24 A That's exactly correct.</p> <p>25 Q Okay. Who is -- who is responsible for coordinating</p>
<p style="text-align: right;">Page 26</p> <p>1 there?</p> <p>2 A Not that I remember. I can't remember that. I'm</p> <p>3 just ready to go when it's time to go.</p> <p>4 Q Well, it's been a long night, yeah.</p> <p>5 A Yeah, it's been a long night, yeah.</p> <p>6 Q Are you -- are you -- are you pretty much always the</p> <p>7 last person to leave?</p> <p>8 A If I'm the superintendent on duty, I have to be</p> <p>9 because I have to set the alarm, yeah.</p> <p>10 Q No, I mean -- so, literally, when I -- you're -- you</p> <p>11 are the one who punches the code and locks the door on the way</p> <p>12 out?</p> <p>13 A That's exactly right.</p> <p>14 Q Okay, okay, so you have to wait until everybody</p> <p>15 leaves.</p> <p>16 A I have to wait.</p> <p>17 Q All right. On a typical event when you're walking</p> <p>18 out and locking the door and setting the alarm, is there still</p> <p>19 a sheriff's deputy there waiting on you to leave?</p> <p>20 A Sometimes. It just depends on -- on how the hours</p> <p>21 are set up as far as the -- I guess you would say, the guests</p> <p>22 are concerned -- the person who's having the event wants it.</p> <p>23 Some of them change the times around. And they'll do that,</p> <p>24 yeah.</p> <p>25 Q Well, I just mean that they're providing security,</p>	<p style="text-align: right;">Page 28</p> <p>1 the security coverage at the Julian Smith events? Who -- who</p> <p>2 does -- who does that?</p> <p>3 A It depends on who's on hand. Sometimes I do it.</p> <p>4 Sometimes -- most of the times Darrell does it. And sometimes</p> <p>5 Chrislynne does it. It depends on who's there.</p> <p>6 Q Do you know who -- do you know who the deputy is</p> <p>7 gonna be ahead of time? Do they tell you who it's gonna be</p> <p>8 ahead of time?</p> <p>9 A Yeah.</p> <p>10 Q Usually about how far ahead of time is -- is that</p> <p>11 information given?</p> <p>12 A For instance, like I'm having an event tomorrow,</p> <p>13 which is Saturday. We called in, say, Monday to find out</p> <p>14 who -- you know, who's the deputy gonna be. So we probably</p> <p>15 knew Monday who the deputy was gonna be, and no later than</p> <p>16 Tuesday.</p> <p>17 Q Okay. So typically four, five days ahead of the</p> <p>18 event?</p> <p>19 A Five days ahead of the event, uh-huh (affirmative).</p> <p>20 Q Okay. So in this case you would have expected</p> <p>21 sometime in that first week of June -- first or early in the</p> <p>22 second week of June 2019?</p> <p>23 A Right, in that first week at least,</p> <p>24 uh-huh (affirmative).</p> <p>25 Q Okay.</p>

<p style="text-align: right;">Page 29</p> <p>1 A And that's the same thing with the fireman.</p> <p>2 Q Okay. And the -- on the night of June 14th of 2019,</p> <p>3 did you ever see Charlie Walker leave the event?</p> <p>4 A That I can't say, see, because I'm not with him, you</p> <p>5 know what I'm saying. So I don't know if he left or not. I do</p> <p>6 know they do check the parking lots and stuff, you know,</p> <p>7 because people's cars and stuff are out there. I don't know</p> <p>8 when they do it, they just do it, you know.</p> <p>9 Q Oh, no, I'm -- yeah, I'm not -- I'm not -- I'm</p> <p>10 just -- really just asking if you happened to see him leave,</p> <p>11 that's all. Okay --</p> <p>12 A No, uh-uh (negative).</p> <p>13 Q Did you ever see him talking to any guests of the</p> <p>14 party?</p> <p>15 A We all do. I mean, we talk -- we all talk to people,</p> <p>16 so I -- I don't know who's -- who's who and what's what, you</p> <p>17 know, so -- because I talk to guests all night long, you know.</p> <p>18 Q Do sheriff's deputies normally arrive in their own</p> <p>19 car, or in a -- or in police cruiser?</p> <p>20 A It varies. Sometimes they're in the police car, and</p> <p>21 sometimes they're in their own car.</p> <p>22 Q When they're working security at the -- at the Julian</p> <p>23 Smith events, are they on duty, or are they off duty working</p> <p>24 security?</p> <p>25 A Off duty.</p>	<p style="text-align: right;">Page 31</p> <p>1 and I was -- and so I was really just asking if you noticed if</p> <p>2 there was anybody like that, an elected official or any --</p> <p>3 A I don't remember if there was anybody like that</p> <p>4 there, no.</p> <p>5 Q Have you ever seen any elected officials or any -- or</p> <p>6 anybody like that at a -- at a 25 Gents event?</p> <p>7 A Not that I can recall.</p> <p>8 Q Okay. Would you recognize an elected official if</p> <p>9 you -- if you saw them?</p> <p>10 A If it's one that I see a lot.</p> <p>11 Q Well, I mean, for instance, I live in Atlanta. And I</p> <p>12 wouldn't recognize a city council person if that was -- so</p> <p>13 that's why I was asking, just to follow up.</p> <p>14 A Yeah, if it's one that I see a lot -- or his face on</p> <p>15 TV a lot or something, you know, maybe, yeah.</p> <p>16 Q Okay, okay. Well, let me look at my notes really</p> <p>17 quick. Give me about five minutes, ten minutes and we'll --</p> <p>18 and I'm gonna look at my notes and I'll come back with some</p> <p>19 follow-up questions. And then we'll probably be able to wrap</p> <p>20 up, okay?</p> <p>21 A All right, that will be fine.</p> <p>22 Q Okay, just give me a few seconds.</p> <p>23 THE VIDEOGRAPHER: And we are -- we are off the</p> <p>24 record at 12:01.</p> <p>25 (Whereupon, a brief recess ensued.)</p>
<p style="text-align: right;">Page 30</p> <p>1 Q They're off duty working security?</p> <p>2 A (Nods head.)</p> <p>3 Q Okay. Was this event -- was the -- was the 25 Gents</p> <p>4 event -- was that a ticketed event? Did people have to buy</p> <p>5 tickets for that event?</p> <p>6 A Yes, uh-huh (affirmative).</p> <p>7 Q Okay. Do you -- were they buying tickets at the</p> <p>8 door, or did they show up with --</p> <p>9 A No, no, no, in advance.</p> <p>10 Q Do you know how they sold their tickets?</p> <p>11 A What do you mean? I guess the members sold them. I</p> <p>12 don't know, you know, because that's done before they get to</p> <p>13 me, so I don't know.</p> <p>14 Q Do you know if anybody that works in the parks</p> <p>15 department is a member of 25 Gents?</p> <p>16 A Not that I know of, you know. I don't know.</p> <p>17 Q Okay. Do you know if anybody -- were there -- was --</p> <p>18 were there any elected officials at -- at the party on June</p> <p>19 14th, 2019?</p> <p>20 A I don't know. I mean, I don't remember, you know,</p> <p>21 about that. I don't know who all was there, you know.</p> <p>22 Q I understand. I just -- you know, sometimes -- for</p> <p>23 instance, sometimes, you know, we -- we go to a -- a Kiwanis</p> <p>24 Club meeting or a Rotary Club meeting and there's a judge and</p> <p>25 there's a county commissioner and things like that. And I --</p>	<p style="text-align: right;">Page 32</p> <p>1 THE VIDEOGRAPHER: All right, and we are back on the</p> <p>2 record at 12:05.</p> <p>3 BY MR. CAUTHORN: (Resuming)</p> <p>4 Q All right, Ms. Johnson.</p> <p>5 A Yes.</p> <p>6 Q When was the first time that you learned about --</p> <p>7 that -- my client's allegations?</p> <p>8 A Probably a few days ago.</p> <p>9 Q Okay.</p> <p>10 A Yeah.</p> <p>11 Q Okay. Has -- in the -- in the time that you've been</p> <p>12 working at Julian Smith Casino and for the parks department,</p> <p>13 are -- have there ever been any complaints of any kind about</p> <p>14 the deputies providing security to events?</p> <p>15 A Not any that I know of, no. I've been fortunate I</p> <p>16 guess. I have some good deputies. I've been fortunate.</p> <p>17 Q What about deputies working other events that you're</p> <p>18 aware of? Have any --</p> <p>19 A Not that I know of, no.</p> <p>20 Q Okay. Have -- are you aware of any complaints about</p> <p>21 Charlie Walker in particular?</p> <p>22 A No. I haven't heard anything about him.</p> <p>23 Q Okay. And do you have any -- any knowledge of him</p> <p>24 outside of his job as a deputy, or do you know anything about</p> <p>25 him with regard to being in the community?</p>

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1 A I don't really know him -- it -- like that, you know
2 what I'm saying, yeah. Some deputies, you know, you get to
3 know them pretty good because you work with them all the time.
4 But I don't really know him like that, you know.
5 Q I understand. And -- and -- and that's what I --
6 that's what I was kind of getting at, you know. You know --
7 you know Mr. Washington and Mr. Jones from being in the
8 community -- and -- and being --
9 A Yeah.
10 Q -- and I didn't know if you had any relationship with
11 Charlie Walker, or knew about him at --
12 A Yeah, I don't know him like that, yeah.
13 Q Do you know if anybody in the parks department has a
14 personal relationship, friendly or unfriendly or otherwise,
15 with Charlie Walker?
16 A Not that I know of. They don't -- you know, I think
17 they just don't bring all that to me.
18 Q Right. Has --
19 A -- do --
20 Q Have -- have you ever heard his name -- have -- have
21 you ever heard his name mentioned outside the context of
22 working as a -- a superintendent at Julian Smith Casino?
23 A No, I haven't.
24 Q I mean, other than, obviously, being here today?
25 A Yeah, I haven't.

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1 Q Okay. I don't have any more questions right now,
2 subject to any kind of follow up that I may have if your --
3 if -- if Mr. Frails or Ms. Haynes have any questions.
4 A Okay.
5 MR. FRAILS: We don't have any questions.
6 MR. CAUTHORN: Okay. Ms. Johnson, thank you for your
7 time. I appreciate it and I -- and I hope that you have a
8 good weekend. And I hope that you get some -- maybe get
9 some sleep tonight so that you -- you'll -- you'll be
10 able to stay up late tomorrow.
11 A I will, thank you. all right.
12 MR. CAUTHORN: And, Jennifer, we can probably go off
13 the record.
14 THE VIDEOGRAPHER: And we are off the record at
15 12:10.
16 (Whereupon, the deposition concluded at 12:10 p.m.)
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C E R T I F I C A T E


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4 COUNTY OF FULTON)
5

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7 for the State of Georgia, do hereby certify that the foregoing
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11 that I am not a relative, employee, attorney or counsel of any
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22 I further certify that the original of said deposition
23 shall be filed under seal with J. Wickliffe Cauthorn, Attorney
24 at Law; The Cauthorn Firm, 201 Cherokee Street, Marietta,
25 Georgia.

This, the 14th day of February, 2022.


JENNIFER A. GERBER

CERTIFIED COURT REPORTER # 6241-2465-4151-2704


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4 COUNTY OF FULTON)
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7 pursuant to Article 10.B of the Rules and Regulations of the
8 Board of Court Reporting of the Judicial Council of Georgia, I
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2. I am a Georgia Certified Court Reporter
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4. Rodman Reporting was contacted by the office of the deposing counsel to provide court reporting services for this deposition.
5. I will not be taking this deposition under any contract prohibited by Georgia law, O.C.G.A. 15-14-37(a). I will charge usual and customary rates to all parties in the case.


JENNIFER A. GERBER

CERTIFIED COURT REPORTER # 6241-2465-4151-2704

Valencia Colon v.
Richard Roundtree et al

Alzater Johnson
February 4, 2022

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